Exhibit B - Fanelli Deposition Transcript Excerpts

say discovery group, or non-clinical group, that would be [redacted] --

Q. Could you spell that for the court reporter's convenience?

A. I can try. His name is -- his last name is [redacted] that's a nickname, and I can't spell that without looking at my e-mail list.

Q. Okay, [redacted]

A. [redacted]

Q. And what group was he, he was in non-clinical and discovery, right?

A. Yes. Still is, yeah.

Q. [redacted] all right.

A. Those are the prime people that I discussed with.

Q. Okay.

Now, do you know when you contacted, let's start with -- so the regulatory affairs department, you contacted two people there and you remember being in contact with [redacted] at non-clinical or discovery research.

Did those two departments, did they access the same database or do they have different databases?

A. They are two different database, the regulatory -- sorry.

Q. Go ahead. Go ahead. Please continue. I'm so sorry to interrupt you.

A. No, it's okay.

The regulatory database is maintained and has all submissions -- and that's the official repository for the regulatory submissions and so forth. That repository is, [redacted] is responsible for and contains all of those documents related to that function.

[redacted] has access to all of the non-clinical work.

What's important to note is that the documents in the non-clinical repository are also the vast majority of them in the regulatory database as they get, become part of a submission or part of an application.

Q. Okay.

including text searchable. So that's a very standard and regulated way of storing the documents.

Q. Now, let's move to Topic 4, which is how Debtors maintain, identify, store, save, retain, archive, delete and dispose of scientific studies that were not submitted to the FDA.

Those studies that are not submitted to the FDA, would they be all maintained in the non-clinical document database?

A. You said all studies -- no -- in the non-clinical database.

First of all, all studies are retained in one form or another. If they're related to safety and efficacy of our approved products, they're in the regulatory database. They may be located in other places such as the medical department or clinical research department, so the final study report exists there as well as it's being prepared and so forth.

You said would something that

wasn't submitted be in the non-clinical. There could be a clinical study of, say -- that doesn't relate to any product at all. It could be a study to -- just an example -- of the monitor of how people report their pain, say something like that. No drug involved. Not part of an IND. It would not be in the non-clinical database because it's not an animal study or an in vitro study. It would be in the clinical department.

Q. Are all dose-ranging studies -- so let's ask this.

Would -- are all dose-ranging studies or were all of Purdue's dose-ranging studies, to your understanding, related to synthetic opioids, were they all submitted to the FDA?

MR. HOFF: Objection to the form.

You can answer.

A. I am not aware of whether or not all of dose-ranging studies. If they were, investigation for a compound that didn't

list any of those for you.

Q. All right.

Could -- so to question 4, how Debtors identify scientific studies that were not submitted to the FDA, could -- with your understanding of the way, first of all, the non-clinical database, document database works, could a report be run that would identify all of the studies that were not submitted to the FDA?

A. So all -- you're asking about all the studies conducted by the non-clinical group that were not submitted to the FDA?

Q. Yes.

A. That would -- you know, that would be in their database, yes.

Q. Okay.

And they could do a search and identify that, right?

A. Yes.

Q. Now, does that database -- and first we're talking about the database, the non-clinical document database, does that database just contain descriptions and

information or is the actual study, can the actual study be accessed through the database?

A. You could access the study in the database, yes.

Q. Can -- does the database maintain or is -- are documents -- are non-final copies of studies not submitted to the FDA, are they maintained in the database?

MR. HOFF: Objection to the form.

A. I'm not sure what you mean by "non-final."

Q. Well, you talked earlier about final reports -- are draft, are draft reports maintained in the database were only the final report?

A. I'm not aware of draft, you know, the existence and maintenance of draft reports.

Q. Okay.

Now let's move to the regulatory database. In addition to studies, final studies that might be maintained in the regulatory document database, are there

look at entry number 3. The database ID is 623. Do you know what that means?

A. No, I do not. I'm not -- you know, I could -- I haven't -- you know, I'm not -- that wasn't my responsibility. This kind of database and records and I'm not sure how this was produced or why it was produced.

I'm aware of many of those columns, so I could provide you some information if that would be helpful.

Q. So what columns are you aware of?

A. So I mean, I know what PKDM. That was a group -- [redacted] who we talked about from the beginning --

Q. Yes.

A. That's pharmacodynamics and drug metabolism.

Q. Okay.

A. So that record, you know, looks like it's in Iron Mountain.

The product code is HMP. That's Hydromorphone, that's Palladone. I'm not sure what CRS is.